

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:18 CR 82 AGF/PLC
)	
KAYLA BRIDGES,)	
)	
Defendant.)	

**DEFENDANT'S MOTION TO BE RELEASED ON BOND UPON COMPLETION OF
THE BUREAU OF PRISONS EVALUATION AND REPORT**

COMES NOW Defendant, by and through counsel, and hereby moves that she be placed back on pre-trial release upon the completion of the competency restoration evaluation and report. In support of this Motion, Defendant states the following:

1. Prior to her commitment to the Bureau of Prisons on or about April 26, 2019, Defendant was on pre-trial release pursuant to a Court Order dated June 19, 2018.
2. Defendant was allowed to self-surrender to the Bureau of Prisons and did in fact report to FMC Carswell as directed on April 26, 2019.
3. The current Court Order (Doc. 102) directs that Defendant be hospitalized for evaluation and treatment for a reasonable period of time, not to exceed four months, which will expire on August 24, 2019.
4. In the event that the Bureau of Prisons does not request additional time to complete said evaluation, Defendant is requesting that the Court enter an order allowing her to be released back onto pre-trial supervision with previous conditions to remain in place.
5. Defendant requests that said Order include language that upon the completion of the evaluation, she be released to her family from FMC Carswell in Fort Worth, Texas.

6. To counsel's knowledge, Defendant has not incurred any bond violations since the report dated October 3, 2018 and was doing well on pre-trial release.
7. Defendant does not pose a flight risk as she has been able to attend all required court dates and in fact successfully self-surrendered in Texas when ordered to do so.
8. Defendant does not pose a risk of danger to the community in that she has shown her ability to successfully follow pre-trial supervision's conditions for an extended period of time.

WHEREFORE, for the foregoing reasons, Defendant requests that this Court enter an Order that upon the completion of the evaluation and treatment of Defendant, she be released to the custody of her family and placed back on pre-trial release pursuant to the prior conditions of supervision.

Respectfully submitted,

/s/ Teneil Kellerman
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 5th day of August, 2019, the foregoing was electronically filed with the Clerk of Court, therefore to be served electronically by operation of the Court's electronic filing system upon all parties including:

Rob Livergood
Assistant U.S. Attorney
Thomas Eagleton U.S. Courthouse
111 S. 10th Street, 20th Floor
St. Louis, MO 63102

/s/ Teneil Kellerman